ATTACHMENT 11-1

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1
                 UNITED STATES DISTRICT COURT
 2
                NORTHERN DISTRICT OF CALIFORNIA
 3
                        SAN JOSE DIVISION
 4
 5
      CISCO SYSTEMS, INC.,
                                 )
 6
                   Plaintiff,
                                 ) Case No.
 7
                                 ) 5:14-cv-05344-BLF (PSG)
              vs.
 8
     ARISTA NETWORKS, INC.,
                                 )
 9
                   Defendant.
10
11
       *** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY ***
12
13
14
15
        VIDEOTAPED DEPOSITION OF RAMANATHAN KAVASSERI
16
                      Palo Alto, California
17
                   Tuesday, February 23, 2016
                            Volume I
18
19
20
21
22
     Reported by:
     CARLA SOARES
     CSR No. 5908
23
     Job No. 2216982
24
25
     Pages 1 - 195
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	HIGHLY CONFIDENTIAL	- ATTORNETS ETES ONLT
1	UNITED STATES DISTRICT COURT	1 APPEARANCES (Continued):
2	NORTHERN DISTRICT OF CALIFORNIA	2
3	SAN JOSE DIVISION	3 For the Witness:
4	OVOCO GVOTTEN (G. DNC.	4 FARELLA BRAUN & MARTEL LLP
)	CISCO SYSTEMS, INC.,)	5 BY: RODERICK M. THOMPSON, Attorney at Law
6	Plaintiff,)	
) Case No.	8
7	vs.) 5:14-cv-05344-BLF (PSG)	7 235 Montgomery Street
)	8 San Francisco, California 94104
8	ARISTA NETWORKS, INC.,)	9 415.954.4400
		10 rthompson@fbm.com
9	Defendant.)	11
10		12
11		13 ALSO PRESENT: Ramon Peraza, Video Operator
12		14
13		15000
14		16
15	MODEOTA BED DEPOSITION OF BANKANATHAN	17
16	VIDEOTAPED DEPOSITION OF RAMANATHAN KAVASSERI, Volume I, taken on behalf of Defendant,	18
	at 601 California Avenue, Palo Alto, California,	19
1	beginning at 10:09 a.m., and ending at 4:26 p.m., on	20
20	Tuesday, February 23, 2016, before CARLA SOARES,	21
21	Certified Shorthand Reporter No. 5908.	22
22		23
23		24
24		25
23	Page 2	
1	APPEARANCES:	1 INDEX
2	THE EMPLICACION.	2 WITNESS
	For the Plaintiff:	3 RAMANATHAN KAVASSERI EXAMINATION
4	QUINN EMANUEL URQUHART & SULLIVAN, LLP	Volume I
5	BY: MARK TUNG, Ph.D., Attorney at Law	4
6	555 Twin Dolphin Drive, 5th Floor	5 BY MR. SANTACANA 10
7		6 BY MR. TUNG 186
	Redwood Shores, California 94065	7
8	650.801.5016	8 EXHIBITS
1	marktung@quinnemanuel.com	9 NUMBER DESCRIPTION PAGE
10		10 Exhibit 325 Ramanathan R. Kavasseri's 22
11		11 Responses and Objections to
	For the Defendant:	12 Defendant Arista Networks'
13	KEKER & VAN NEST LLP	13 Subpoena to Testify at a
14	BY: EDUARDO E. SANTACANA, Attorney at Law	14 Deposition
15	BY: RYAN WONG, Attorney at Law	15
16	633 Battery Street	16 Exhibit 326 LinkedIn page for Ram 24
17	San Francisco, California 94111	17 Kavasseri
18	415.391.5400	18
19	esantacana@kvn.com	19 Exhibit 327 Document headed "A Simple 52
20	rwong@kvn.com	20 Network Management Protocol,"
21		21 dated 8/1988,
22		22 Bates ARISTANDCA00022432 - 2464
23		23
24		24 Exhibit 328 Document headed "Event MIB," 83
25		25 dated 10/2000
	Page 3	
		·

INGILI CONTIDENTIAL	- ATTORNETS ETES ONLT
1 EXHIBITS	1 REFERENCED EXHIBITS
2 NUMBER DESCRIPTION PAGE	2 (Not attached)
3 Exhibit 329 Document headed "Commands for 94	3 Exhibit/Page
4 which Cisco listed Ramanathan	4 92 89
5 Kavasseri as 'Author/Originator'	5
6 in Cisco's response to Interrogatory	6000
7 No. 16, Exhibit F (January 12, 2016)"	7
8	8
9 Exhibit 330 Document labeled "Ram Kavasseri, 101	9
10 Garry Horoupian," dated 2/8/06,	10
11 Bates CSI-CLI-00682250 - 2314	11
12	12
13 Exhibit 331 Document labeled "Parser Police: 122	13
14 Where can we go from here?"	14
15 Bates CSI-ANI-00031041 - 0032	15
16	16
17 Exhibit 332 Document headed "Hot ICE Product 129	17
18 Requirements Document,"	18
19 Bates CSI-CLI-00662062 - 2085	19
20	20
21 Exhibit 333 Document headed "Unprintable 132	21
22 File,"	22
23 first page Bates CSI-CLI-00358160	23
24	24
25	25
Page 6	Page 8
1 EXHIBITS	1 Palo Alto, California 09:21:40
2 NUMBER DESCRIPTION PAGE	Tuesday, February 23, 2016
3 Exhibit 334 Document headed "User-based 149	3 10:09 a.m.
4 Security Model (USM) for version 3	4
5 of the Simple Network Management	5 PROCEEDINGS 09:21:40
6 Protocol (SNMPv3)," dated 1/1998	6 THE VIDEO OPERATOR: Good morning. We are
7	7 on the record at 10:09 a.m. on February 23rd, 2016.
8 Exhibit 335 Document headed "View-based 151	8 This is the videotaped deposition of Mr. Ramanathan
9 Access Control Model (VACM) for	9 Kavasseri.
10 the Simple Network Management	10 My name is Ramon Peraza, here with our 10:09:15
Protocol (SNMP)," dated 1/1998	11 court reporter, Carla Soares. We're here from
12	12 Veritext Legal Solutions at the request of counsel
13 Exhibit 336 Document headed "An Architecture 154	13 for the defendant.
14 for Describing SNMP Management	14 This deposition is being held at Wilson
Frameworks," dated 1/1998	15 Sonsini in Palo Alto. The caption of this case is 10:09:26
16	16 Cisco Systems, Inc., versus Arista Networks, Inc.,
17 Exhibit 337 Document headed "Doc Number 159	17 Case No. 5:14-cv-05344-BLF (PSG).
18 ENG-28473,"	18 Please note that audio- and
19 Bates CSI-CLI-00609071 - 9083	19 video-recording will take place unless all parties
20	20 have agreed to go off the record. Microphones are 10:09:50
21 Exhibit 338 Document entitled "Cisco IOS 172	21 sensitive and may pick up whispers or private
22 Network Management Command	22 conversations.
Reference," dated 10/2009,	23 At this time, Counsel, please identify
24 Dates CCI CLI 00210765 1101	24 yourselves for the record and state whom you
24 Bates CSI-CLI-00319765 - 1101	ar yourserves for the record and state whom you
25 Bates CSI-CLI-00319703 - 1101	25 represent. 10:10:00

1 Q Sure. 11:37:17	
110/11/	1 don't recall the features that I was working on, so 11:40:26
2 The functional specifications that you	2 I don't recall specifically what I would have done
3 reviewed when developing SNMP features, would that	3 to compare.
4 specification have been written by someone at Cisco?	4 Q I see.
5 A Yes. 11:37:27	5 Was it part of your process in developing 11:40:35
6 Q And did you were you involved in	6 features to review what other vendors were doing to
7 writing any functional specifications?	7 implement the same features?
8 A Yes, I was.	8 A Other so in the space that we worked
9 Q Was that for the features that you were	9 with SNMP, vendors contributed to the IETF document
10 implementing? 11:37:36	10 so it wasn't as necessary to look at their 11:40:59
11 A Yes, it was. Yes, it was.	11 implementations because they were there telling us
12 Q Do you recall right now which functional	12 what they were trying to build. That was the whole
13 specifications you may have written?	13 point of building an industry standard.
A Not off the top of my head, no.	14 Also, Cisco was on the leading edge of
5 Q Did the GEM methodology involve reviewing 11:37:57	15 implementing the protocols as they were being 11:41:11
6 IETF documents?	16 developed. In a few cases, we would have the
17 A As far as I recall, no.	17 implementations before the protocols were released
8 Q Did you review IETF documents when you	18 because we were helping author the protocol.
9 were implementing SNMP features?	19 So at that point, looking at other vendors
20 A That is a broad question. If the feature 11:38:12	20 was not possible because they had not done the 11:41:24
21 had anything specific to do with an IETF document,	21 implementations or released the implementations,
22 then yes, I would have had to review the document to	22 which is why I was being very specific in saying, I
23 make sure I was implementing it correctly, "it"	23 don't recall the exact features I was working on.
24 being whatever I was working on,	24 But my answer would change depending on
25 Q Okay. And that is something you would 11:38:26	25 what I was working on and depending on whether 11:41:
Page 62	Page
I have reviewed an IETF document relating to a feature 11:38:31	I somebody had done something in the field. 11:41:40
2 you were implementing before you implemented the	2 Q I understand.
3 feature; is that right?	3 Who else worked on the team that was
4 A If there was an IETF document associated	4 implementing SNMP features at Cisco?
	4 implementing SNMP features at Cisco? 5 A I don't remember all the names, but my 11:41:58
5 with what I was working on and I was required to 11:38:41	3 8
5 with what I was working on and I was required to 6 implement part or the whole part of that IETF	5 A I don't remember all the names, but my 11:41:58 6 manager was John Hopprich. My technical lead and
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1 Q If you take a look at the last command in 14:41:36	1 at 2:44 p.m. 14:44:02
2 this table, "snmp-server user," do you know whether	2 (Recess, 2:44 p.m 3:05 p.m.)
3 you authored that command?	3 THE VIDEO OPERATOR: We are back on the
4 A Define what you mean by "authored that	4 record at 3:05 p.m.
5 command." 14:41:55	5 BY MR. SANTACANA: 15:05:39
6 Q Do you know whether you are the one who	6 Q Mr. Kavasseri, we left off talking about
7 came up with the sequence of words that resulted in	7 the "snmp-server user" command, and you testified
8 this command, "snmp-server user"?	8 that "snmp-server" came from a prior command in IOS
9 A I cannot be definitive about it.	9 at the time?
10 Q Who else do you recall working with on 14:42:07	10 A No, I said that I don't know how it came 15:05:56
11 this project that resulted in these eight commands?	11 about. It was already there when I joined Cisco.
12 A I would probably have reviewed this with	
13 my team members. And so I can't the reason I	
	13 which you are named the author, it's included there
14 answered the way I did is, I don't know if I came up	14 because it was already part of IOS?
15 with the word "user" or somebody else came up with 14:42:2	
16 the word "user." So I'm not sure in hindsight.	16 I added extensions.
17 Q Did you come up with the term	17 Q And the root was in IOS before you started
18 "snmp-server"?	18 working at Cisco?
19 A Absolutely not.	19 A To the best of my knowledge, it was
Q Okay. How do you know that? 14:42:39	20 already there before I started. 15:06:23
A It was there before I joined.	21 Q And the term "user" is a term that comes
Q It was where?	22 from the SNMP industry standard?
23 A It was in the IOS CLI before I joined	23 A I'm not sure I'd say it exactly that way.
24 Cisco.	24 The term "user" relates to parts of the SNMP V3
Q Okay. And so the addition to that term 14:42:48	25 protocol, yes. 15:06:48
Page 146	Page 148
1 that was new was the word "user"? 14:42:52	1 Q Is that a term that the protocol uses? 15:06:49
2 A Yes.	2 A I believe so, but I if you have a copy
3 Q Okay. And do you know where that word	3 of the reference, I could take a look.
4 came from?	4 Q Sure. Of course.
5 A The SNMP V3 protocol specification has a 14:43:00	5 THE VIDEO OPERATOR: Exhibit 334. 15:07:03
6 definition of roles, if I remember right, and users	6 (Exhibit 334 was marked for identification
7 and groups are in the protocol.	7 and is attached hereto.)
8 Q So the term "user" came from the	8 BY MR. SANTACANA:
9 protocol came from the industry standard 10 protocol? 14:43:21	
11 A Yes.	11 Network Management Protocol (SNMP V3)."
MR. TUNG: Objection. Mischaracterizes,	Do you know, sir, if this is an RFC that
THE WITNESS: It referred to what was in	13 you reviewed when you were
14 the protocol, yes.	14 A Yes. Let me I'm pretty sure this was
15 BY MR. SANTACANA: 14:43:29	15 an RFC I reviewed because I ended up implementing 15:07:3
16 Q And the protocol uses the word "user"?	16 parts of it.
17 A I've got to go read the protocol to be	17 Q And just to be clear, it's an RFC that you
	18 reviewed when you were implementing the eight
18 absolutely sure.	19 commands in Exhibit 329?
A CONTRACTOR OF THE CONTRACTOR	The state of the s
19 Q Okay.	20 A Seven. I'm not sure about "snmp host." 15:07:53
19 Q Okay. 20 A After this, can we take a break? 14:43:51	 20 A Seven. I'm not sure about "snmp host." 15:07:53 21 Q Okay. So this is something you would have
19 Q Okay. 20 A After this, can we take a break? 14:43:51 21 Q Of course.	Q Okay. So this is something you would have
19 Q Okay. 20 A After this, can we take a break? 14:43:51 21 Q Of course. 22 If you want, we can take a break right	Q Okay. So this is something you would havereviewed before you proposed those command names?
19 Q Okay. 20 A After this, can we take a break? 14:43:51 21 Q Of course. 22 If you want, we can take a break right 23 now.	 Q Okay. So this is something you would have reviewed before you proposed those command names? A Yes, that's correct.
20 A After this, can we take a break? 14:43:51 21 Q Of course. 22 If you want, we can take a break right 23 now.	 Q Okay. So this is something you would have reviewed before you proposed those command names? A Yes, that's correct.

1 uses it? 15:08:17	1 Q Is this a document you reviewed when you 15:12:26
2 A I would have to read it. Give me a minute 3 to	were preparing to implement the commands in Exhibit 329?
4 Can you rephrase or repeat the question,	4 A I believe it would have been something I
5 please? 15:09:11	5 reviewed before I implemented the commands. 15:12:35
6 Q This RFC 2274, does this document use the	6 Q And if you flip to page 3 of the document,
7 term "user" the same way that you used the term	7 under Section 2.1 titled "Groups," the first
8 "user" in "snmp-server user"?	8 paragraph defines the term "group" as follows: "A
9 A The document does not define a CLI command	9 group is a set of zero or more securityModel,
10 or so I will the term "user" seems to refer to 15:09:3	910 securityName tuples on whose behalf SNMP management 15:12:55
11 the same entity in both cases. But the document	11 objects can be accessed. A group defines the access
12 does not tell me there needs to be a command called	12 rights afforded to all securityNames which belong to
13 "snmp-server user."	13 that group,"
14 Q I understand.	14 Does this RFC use the term "group" the
15 A Okay. 15:10:09	15 same way that you were using it in your "snmp-server 15:13:08
16 Q So you did not come up with the term	16 group" command?
17 "user"?	17 A I believe so.
18 A In which context?	18 Q What does the "snmp-server group" command
19 Q In the context of this "snmp-server user"	19 do?
20 command. 15:10:32	20 A Actually, even reading this document 15:13:26
A As I responded earlier, I'm not sure how	21 probably won't tell me because I need to see all the
22 the term "user" came about, whether it was due to a	22 help extensions to see what it does.
23 group interaction or something I did or something	23 Q Okay.
24 somebody else did.	24 A So it's been a while.
25 Q Okay. I'd like to direct your attention 15:10:50 Page 150	25 Q You don't recall what it does? 15:13:34 Page 152
1 now to "snmp-server group," which is the next row 15:10:53	1 A No. 15:13:35
2 up.	2 Q Okay. Do you recall what "snmp-server
3 A Yeah.	3 user" does?
4 Q As you've testified, "snmp-server" was a	4 A I would rather not guess at this point.
5 term that was a root already present in IOS at this 15:11:03	5 It's been years since I used these commands. 15:13:45
6 time; is that correct?	6 I probably would be able to figure it out
7 A Yes.	7 within about 25 minutes of touching the CLI, but
8 Q The term "group," did that come from IOS	8 it's really old, old stuff.
9 as well or did it come from somewhere else?	9 Q I understand.
10 A I believe there was a concept of "group" 15:11:20	10 I'd like to turn your attention now to the 15:14:14
11 in this document. Let me look through it one more	11 two commands right above that, "snmp-server engineID
12 time.	12 local" and "snmp-server engineID remote."
13 Q I think you'll have more luck with this	13 Did you author those commands?
14 one.	14 A I think I have a strong recollection that
15 A Yeah, there may be a separate document for 15:11:48	15 1 had more to do with these commands; in part, the 15:14:32
16 that.	16 fact that there was the ID which is upper case,
(Exhibit 335 was marked for identification	17 which is usually not what we do in these IOS CLI
18 and is attached hereto.)	18 commands. It stands out.
19 BY MR. SANTACANA:	19 Q Typically in IOS CLI you weren't
Q Exhibit 335 is RFC 2275 entitled 15:12:02	20 accustomed to seeing letters capitalized like they 15:14:52
21 "View-based Access Control Models (VACM) for the	21 are in the term "engineID"? 22 A Yes.
22 Simple Network Management Protocol (SNMP)." It's dated January 1998.	
24 Do you recognize this document, sir?	 Q Why were they capitalized here? A I have no idea why I capitalized them.
LAN VOIL ICCOMMISC THIS GOCHIHER SILV	A I have no idea why I capitalized them.
25 A Yes, I do. 15:12:25	25 Q Okay. 15:15:07

1 rest of the configuration through SNMP directly. 15:31:32	1 team suggested, "Hey, go with the shortest string." 15:34:39
2 This was not possible before.	2 Because when you're talking about the
3 Because it was not possible before, we had	3 command line, it's all about how many characters you
4 never bothered with creating communities which	4 type, or it's a lot to do with how many characters
5 existed before SNMP V3 through SNMP. So now we 15:31:46	5 you type. 15:34:51
6 needed to add that as a support feature as well.	6 Q Why is that?
7 BY MR. SANTACANA:	7 A Well, you could type U and hit "tab," and
8 Q And the reason you needed to add the	
Maria de la compania	8 if there was no other word that started with U, IOS
9 ability to create and delete communities, users and	9 would auto-complete to "user." So you didn't need
10 groups was because of the features of the industry 15:31:59	10 to type the whole thing. 15:35:03
II standard SNMP V37	11 Q Okay. If you turn to the page that ends
12 A I don't know whether SNMP V3 the	12 in 82, this is the end of a list of CLI commands
3 SNMP V3 talked about users, not communities, if 1	13 that you're proposing, and this one in particular is
14 remember right. I think that's what we referred to	14 the "snmp-server engineID" command.
15 in the in getting things getting tricky. 15:32:24	15 Do you see that? 15:35:28
Even now we just had it through SNMP, so	16 A Can you repeat that again, please?
7 only the IOS CLI was the point of record. I'm not	17 Just I'm slowing down reading stuff already.
8 sure whether I meant here that you could delete	18 Q Of course. After the first paragraph
9 stuff through SNMP that was created through the CLI	19 here, which carries over from the previous page,
20 and now the CLI needs to be regenerated or resaved 15:32:38	20 there's an asterisk, and then there's the 15:35:40
21 to NV RAM.	21 "snmp-server engineID" command.
Q Okay. I think I understand. And it might	22 A Yeah.
23 be clear if you flip to the page that ends in 75.	23 Q And then below that you describe what the
24 Section 2.7.	24 command is and what it's going to do.
25 Section 2.7 says, "SNMP V1/V2 versus SNMP 15:33:02	25 Do you see that? 15:35:49
Page 162	
1 V3 differences, and how things work." 15:33:07	1 A Yeah. 15:35:51
2 And then you have a list of differences	2 Q And then also it shows that local and
3 and how things work between the old and the new	3 remote are optional arguments.
4 versions of SNMP.	4 Do you see that?
5 The first thing that you wrote was, "In 15:33:18	5 A Where does it say local and remote are 15:36:03
6 SNMP V3, 'community strings' are called 'users,"	6 optional arguments?
7 and "users" is in quotation marks. "Each 'user,"	7 Q Directly under "snmp-server engineID," do
8 in quotation marks again, "has an access-policy,	8 you see the open bracket, and then it says, "local,"
9 which is termed a 'group," and the word "group" is	9 and then there's a vertical line, and then it says,
0 also in quotation marks, "i.e., users belong to a 15:33:31	[- 1일 - 1일 하는 19] [- 10 - 10 - 10 - 10 - 10 - 10 - 10 -
1 group."	Mary research confidence
	11 A So
2 A Yep.	12 Q So it indicates that the command
Q Does this strike that.	13 "snmp-server engineID" could either take the local
4 Does this refresh your recollection as to	14 argument or the parameter, if you will, or the
5 whether the terms "users" and "group" came from the 15:33:49	(N.D.) (N
6 SNMP standard?	16 A No, I don't think that this is an optional
A. The term "user" and "group" referred to	17 argument. I think there's a typo in this text here.
8 concepts in the SNMP standard. Of that, I have no	18 Q Okay.
9 issue with saying that.	19 A Because if you look at it, the first
The reason I hesitate is, we use the term 15:34:19	20 bracket is an open curly brace. There is no close 15:36:34
1 "user," and we could have used VACM user or any	21 curly brace.
2 other combination of "user."	22 I assume that and again, I could be
We settled on "user." I'm not sure that	23 completely wrong on this. I assume that the if
4 that was because it was directly due to looking at	24 you look at "remote ipaddress udp-port," and then
5 the RFC, or somebody in parser police or within my 15:34:35	25 within angle brackets, "port," following that are 15:36:52
Page 163	Page 16.

1 standard protocol while you were working at Cisco? 15:42:40	
1 standard protocol with you were working at cisco. 15.42.40	1 Q I understand. 15:45:53
2 A I was not in the room for discussions	2 You've expressed some additional haziness
3 to let me rephrase by saying I had very limited	3 about the command "show snmp host."
4 interactions at the time this document was written.	4 A Yes.
5 I know that Jeffrey Johnson was very 15:43:08	5 Q I'm going to apologize in advance for the 15:46:21
6 involved because he was my mentor, and he would tell	6 heft of this thing.
7 me that he was working on the RFC draft. I have no	7 A Holy cow.
8 direct evidence of the other two that I can recall.	8 (Exhibit 338 was marked for identification
9 I will add an addendum that they both were	9 and is attached hereto.)
0 very respected people, and I'm very sure they did a 15:43:32	10 BY MR. SANTACANA: 15:46:31
1 lot for these documents. I just don't have any	11 Q Exhibit 338 is titled "Cisco IOS Network
2 direct evidence that I was privy to from a working	12 Management Command Reference." It bears control
3 meeting or anything else.	13 numbers beginning with CSI-CLI-00319765, and it's
4 Q Okay. So you can set that aside now.	14 dated October 2009.
5 Looking back at Exhibit 329, we'd started 15:43:57	15 I just want you to flip to the page that 15:47:03
6 discussing the four "show" commands, "show snmp"	16 ends in 1060. The internal page would be NM-1248.
7 commands.	17 So this page relates to the command
8 "Show" was a term that was already in	18 "snmp-server host."
9 IOS CLI; is that fair to say?	19 A Yes.
0 A When I joined Cisco I've actually never 15:44:11	20 Q Do you recognize that command? 15:47:58
1 asked the question when "show" was in the command.	21 A Yes, now I do.
2 As far as I can tell, it was there when I joined.	22 Q Did you author that command?
3 Q And the reason that you used it here was	
because it was already used in other IOS CLI	
5 commands? 15:44:37	24 that it's highly likely that I checked in the file
Page 170	25 with this command. Especially with this command, I 15:48:2 Page 17
A By the time I implemented these commands, 15:44:38	1 am not sure whether I was the original author of the 15:48:24
2 "show" was the standard way to display information	2 term "host."
from the CLI.	3 I'm going to say "term" instead of
Q And the term "SNMP," of course, as we've	4 "command," which you used, because we're talking
5 discussed, is an industry standard protocol; is that 15:44:49	5 about an extension to the SNMP server command here. 15:48
fair to say?	6 The reason I say "host" is, if I remember
fair to say? A In which context? The term "SNMP" by	6 The reason I say "host" is, if I remember 7 right, the previous version, now that I'm reading
A In which context? The term "SNMP" by	
A In which context? The term "SNMP" by itself as an acronym is industry standard protocol,	7 right, the previous version, now that I'm reading 8 this, we are specifying the target of an event that
A In which context? The term "SNMP" by itself as an acronym is industry standard protocol, by yes.	7 right, the previous version, now that I'm reading
A In which context? The term "SNMP" by 3 itself as an acronym is industry standard protocol, 9 yes. Q And then so the first two words in each of 15:45:07	7 right, the previous version, now that I'm reading 8 this, we are specifying the target of an event that 9 is being messaged through SNMP.
A In which context? The term "SNMP" by 3 itself as an acronym is industry standard protocol, 9 yes. 9 Q And then so the first two words in each of 15:45:07 14 these commands is "show snmp." And then we have	7 right, the previous version, now that I'm reading 8 this, we are specifying the target of an event that 9 is being messaged through SNMP. 10 Previously this event was called a trap. 15:48:58
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A In which context? The term "SNMP" by itself as an acronym is industry standard protocol, yes. Q And then so the first two words in each of these commands is "show snmp." And then we have show snmp user" and "show snmp group." A Yeah. Q And the terms "user" and "group" also are	7 right, the previous version, now that I'm reading 8 this, we are specifying the target of an event that 9 is being messaged through SNMP. 10 Previously this event was called a trap. 15:48:58 11 Now we're giving you the option of a trap or an 12 inform. 13 So there was some effort to differentiate 14 between what was before and what is now the
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A In which context? The term "SNMP" by itself as an acronym is industry standard protocol, yes. Q And then so the first two words in each of these commands is "show snmp." And then we have "show snmp user" and "show snmp group." A Ycah. Q And the terms "user" and "group" also are terms that are used in the IETF SNMP documents; is that fair to say? A "User" and "group" appear in the "snmp user" and "group" appear in the "snmp user" and "group" appear in the IETF documents. Q And the way that they're used here is the same way that they're used in those IETF documents? 15:45:35	7 right, the previous version, now that I'm reading 8 this, we are specifying the target of an event that 9 is being messaged through SNMP. 10 Previously this event was called a trap. 15:48:58 11 Now we're giving you the option of a trap or an 12 inform. 13 So there was some effort to differentiate 14 between what was before and what is now the 15 acceptable accepted way of configuring targets. 15:49:20 16 Q If you look at the page NM-1251, control 17 number ends in 1063, this is a command history for 18 the command "snmp-server host," and it lists as the 19 first release IOS version 10. 20 Do you see that? 15:50:04
A In which context? The term "SNMP" by itself as an acronym is industry standard protocol, yes. Q And then so the first two words in each of these commands is "show snmp," And then we have "show snmp user" and "show snmp group." A Yeah. Q And the terms "user" and "group" also are terms that are used in the IETF SNMP documents; is that fair to say? A "User" and "group" appear in the "snmp user" and "group" appear in the IETF documents. Q And the way that they're used here is the same way that they're used in those IETF documents? A To the best of my knowledge, they refer to	7 right, the previous version, now that I'm reading 8 this, we are specifying the target of an event that 9 is being messaged through SNMP. 10 Previously this event was called a trap. 15:48:58 11 Now we're giving you the option of a trap or an 12 inform. 13 So there was some effort to differentiate 14 between what was before and what is now the 15 acceptable accepted way of configuring targets. 15:49:20 16 Q If you look at the page NM-1251, control 17 number ends in 1063, this is a command history for 18 the command "snmp-server host," and it lists as the 19 first release IOS version 10. 20 Do you see that? 15:50:04 21 A "Host"? I thought that that previous
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A In which context? The term "SNMP" by itself as an acronym is industry standard protocol, yes. Q And then so the first two words in each of these commands is "show snmp," And then we have "show snmp user" and "show snmp group." A Yeah. Q And the terms "user" and "group" also are terms that are used in the IETF SNMP documents; is that fair to say? A "User" and "group" appear in the "snmp user" and "group" appear in the IETF documents. Q And the way that they're used here is the same way that they're used in those IETF documents? A To the best of my knowledge, they refer to the same things. But they're not used in the same way in that the IETF document does not refer to a	7 right, the previous version, now that I'm reading 8 this, we are specifying the target of an event that 9 is being messaged through SNMP. 10 Previously this event was called a trap. 15:48:58 11 Now we're giving you the option of a trap or an 12 inform. 13 So there was some effort to differentiate 14 between what was before and what is now the 15 acceptable accepted way of configuring targets. 15:49:20 16 Q If you look at the page NM-1251, control 17 number ends in 1063, this is a command history for 18 the command "snmp-server host," and it lists as the 19 first release IOS version 10. 20 Do you see that? 15:50:04 21 A "Host"? I thought that that previous 22 version was "enable trap." Let me double-check. 23 Yeah, this differs from my recollection.
8 itself as an acronym is industry standard protocol, 9 yes. 0 Q And then so the first two words in each of 15:45:07 1 these commands is "show snmp." And then we have 2 "show snmp user" and "show snmp group." 3 A Yeah. 4 Q And the terms "user" and "group" also are 5 terms that are used in the IETF SNMP documents; is 15:45:21 6 that fair to say? 7 A "User" and "group" appear in the "snmp 8 user" and "group" appear in the IETF documents. 9 Q And the way that they're used here is the 0 same way that they're used in those IETF documents? 15:45:35	7 right, the previous version, now that I'm reading 8 this, we are specifying the target of an event that 9 is being messaged through SNMP. 10 Previously this event was called a trap. 15:48:58 11 Now we're giving you the option of a trap or an 12 inform. 13 So there was some effort to differentiate 14 between what was before and what is now the 15 acceptable accepted way of configuring targets. 15:49:20 16 Q If you look at the page NM-1251, control 17 number ends in 1063, this is a command history for 18 the command "snmp-server host," and it lists as the 19 first release IOS version 10. 20 Do you see that? 15:50:04 21 A "Host"? I thought that that previous 22 version was "enable trap." Let me double-check.

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7		
8	I, RAMANATHAN KAVASSERI, do hereby declare	
9	under penalty of perjury that I have read the	
ł	foregoing transcript; that I have made any	
ļ.	corrections as appear noted, in ink, initialed by	
	me, or attached hereto; that my testimony as	
1	contained herein, as corrected, is true and correct.	
14	EXECUTED this day of,	
15	2016, at	
16	(City) (State)	
17		
18		
19		
20	RAMANATHAN KAVASSERI	
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23		
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25		
	Page 194	
1	I, the undersigned, a Certified Shorthand	
2	Reporter of the State of California, do hereby	
3	certify:	
4	That the foregoing proceedings were taken	
	before me at the time and place herein set forth;	
	that any witnesses in the foregoing proceedings,	
	prior to testifying, were administered an oath; that	
	a record of the proceedings was made by me using	
	machine shorthand which was thereafter transcribed under my direction; that the foregoing transcript is	
	a true record of the testimony given.	
12	Further, that if the foregoing pertains to	
	the original transcript of a deposition in a Federal	
	Case, before completion of the proceedings, review	
	of the transcript [X] was [] was not requested.	
16	I further certify I am neither financially	
17	interested in the action nor a relative or employee	
18	of any attorney or any party to this action.	
19	IN WITNESS WHEREOF, I have this date	
20	subscribed my name.	
21		
	Dated: 3/7/16	
23		
24	Carla Soares	
25	CARLA SUAKES	
	CSR No. 5908	
	1 450 175	

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1
                  UNITED STATES DISTRICT COURT
 2
                NORTHERN DISTRICT OF CALIFORNIA
 3
                        SAN JOSE DIVISION
 4
 5
     CISCO SYSTEMS,
                     )
     INC.,
 6
                         )
 7
          Plaintiff, )
 8
              vs. ) No. 5:14-cv-05344-BlF (PSG)
 9
     ARISTA NETWORKS, )
     INC.,
10
          Defendant. )
11
12
13
      CONFIDENTIAL INFORMATION UNDER THE PROTECTIVE ORDER
14
15
            VIDEOTAPED DEPOSITION OF ANTHONY J. LI
16
                        Palo Alto, CA
17
                   Monday, February 1, 2016
18
                           Volume I
19
20
21
     Reported by: SUSAN F. MAGEE, RPR, CCRR, CLR
22
     CSR No. 11661
23
     JOB No. 2224600
24
25
     PAGES 1-258
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1 UNITED STATES DISTRICT COURT	1 INDEX
2 NORTHERN DISTRICT OF CALIFORNIA	2
3 SAN JOSE DIVISION	3 CONFIDENTIAL INFORMATION UNDER THE PROTECTIVE ORDER
4	4 VIDEO DEPOSITION OF ANTHONY J. LI
5 CISCO SYSTEMS,)	5 Volume I
6 INC.,)	6 EXAMINATION BY PAGE
7 Plaintiff,)	7 BY MR. WONG 9
8 vs.) No. 5:14-cv-05344-BlF (PSG)	8 BY MR PAK 191
9 ARISTA NETWORKS,)	9
10 INC.,)	10
11 Defendant.)	
12	12
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14	14
15 CONFIDENTIAL INFORMATION UNDER THE	15
16 PROTECTIVE ORDER VIDEO DEPOSITION OF ANTHONY J. LI	16
17 taken on behalf of Defendant at WILSON, SONSINI,	17
18 GOODRICH & ROSATI, 601 South California Avenue,	18
19 Palo Alto, CA 94304, beginning at 9:13 a.m. and	19
20 ending at 4:17 p.m. on Monday, February 1, 2016,	20
21 before Susan F. Magee, RPR, CCRR, CLR, Certified	21
22 Shorthand Reporter No. 11661.	22
23	23
24	24
25 P	25
Page 2	Page 4
1 APPEARANCES:	1 EXHIBITS
2	2 NUMBER DESCRIPTION PAGE
3 For the Plaintiff:	3
4 QUINN, EMANUEL, URQUHART & SULLIVAN	4 Exhibit 136 LinkedIn Profile (8 pages) 12
5 BY: SEAN PAK, ESQ.	5 Exhibit 137 RFC Table (3 pages) 90
6 50 California Street	6 Exhibit 138 March 1995 RFC 1771, A Border 100
7 22nd Floor	7 Gateway Protocol 4 (BGP-4) (57
8 San Francisco, CA 94111	8 pages)
9 (415) 875-6600	9 Exhibit 139 December 1995 RFC 1887, An 105
10 seanpak@quinnemanuel.com	10 Architecture for IPv6 Unicast
11	11 Address Allocation,
12 For the Defendant:	12 ARISTANDCA00025747-ARISTANDCA
13 KEKER & VAN NEST LLP	13 00025772
14 BY: RYAN WONG, ESQ.	14 Exhibit 140 June 1996 RFC 1966, BGP Route 111
15 BRIAN L. FERRALL, ESQ.	15 Reflection, An Alternative to
16 633 Battery Street	16 Full Mesh IBGP,
17 San Francisco, CA 94111-1809	17 ARISTANDCA00025927-ARISTANDCA
18 (415) 773-6682	18 00025933
` '	
	,
20 bferrall@kvn.com	
21	21 with Two-Level IS-IS (16 pages)
22 The Videographer:	22 Exhibit 142 August 1996 RFC 1997, BGP 119
23 JEFREE ANDERSON	
	Communities Attribute,
24	24 ARISTANDCA00026094-ARISTANDCA
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1 DWHIDIMOV C D	
1 EXHIBITS (continued)	1 Palo Alto, CA, Monday February 1, 2016
2 NUMBER DESCRIPTION PAGE	2 9:13 a.m.
3	3
4 Exhibit 143 March 1998 RFC 2281, Cisco Hot 12	4 4 THE VIDEOGRAPHER: Good morning. We're on
5 Standby Router Protocol (HSRP),	5 the record at 9:13 a.m. on February 1st, 2016. This 09:13:47
6 ARISTANDCA00026832-ARISTANDCA	6 is the video recorded deposition of so sorry. Of
7 00026848	7 Anthony Li here with our court reporter Susan Magee.
8 Exhibit 144 E-mail String Containing 143	8 My name is Jefree Anderson. We are here
9 9/22/92 E-mail from/to Toni Li,	9 from Veritext Legal Solutions at the request of
10 TS-00000066	10 counsel for the defendant or the plaintiff? 09:14:16
11 Exhibit 145 Procket Networks PRO/8000 163	11 MR. WONG: Defendants.
12 Series Software Introduction	12 THE VIDEOGRAPHER: For the defendant. This
13 (144 pages)	
14 Exhibit 146 Procket Networks PRO/8000 164	13 deposition is being held at Wilson Sonsini at
	14 601 California Avenue, Palo Alto, California. The
	15 caption of this case is Cisco Systems, Incorporated 09:14:31
(* F. 8)	16 vs. Arista Networks, Incorporated. The case number
	17 is 5:14-cv-05344.
18 Series System Management and	18 Please note that audio and video recording
Operations (604 pages)	19 will take place unless all parties agree to go off
20 Exhibit 148 Cisco's 6th Supplemental 167	20 the record, and microphones are sensitive and may 09:14:53
21 Response to Interrogatory NO.	21 pick up whispers, private conversations and cellular
22 16 and Response to	22 interference; so please be aware of that.
23 Interrogatory No. 19 Amended	23 Beginning with our noticing attorney,
24 Exhibit F (45 pages)	24 please state your name and the firm you represent.
25 Exhibit 149 List of Commands (1 page) 169	25 MR. WONG: Ryan Wong from Keker & Van Nest 09:15:05
Page 6	Page 8
1 EXHIBITS (continued)	1 for defendant Arista Networks.
2 MINADED DESCRIPTION DAGE	
2 NUMBER DESCRIPTION PAGE	2 MR. FERRALL: Brian Ferrall, Keker & Van
2 NUMBER DESCRIPTION PAGE 3	2 MR. FERRALL: Brian Ferrall, Keker & Van 3 Nest, also for Arista.
	,
3	3 Nest, also for Arista.
3 4 Exhibit 150 1/20/96 E-mail from Toni Li to 183	Nest, also for Arista. MR. PAK: Sean Pak of Quinn for Cisco.
3 4 Exhibit 150 1/20/96 E-mail from Toni Li to 183 5 Bill W., CSI-CLI-00746246	3 Nest, also for Arista. 4 MR. PAK: Sean Pak of Quinn for Cisco. 5 THE VIDEOGRAPHER: Thank you. 09:15:16
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6 A. I'm sorry. I don't remember. 6 Q. And after you worked on TCP header 7 Q. You mentioned RSX-IIM? 8 A. It's 11M. 8 Cisco? 9 Q. 11M. Sorry. 9 A. I had numerous routing small projects	:48:41
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10 A. This was an operating system for PDP-11s. 09:46:06 10 within routing extending various interfaces and 09:	
[마음 :	48:58
	10.00
12 A. That was a computer built by 12 My next big project was actually working on	
13 Digital Equipment Corporation. 13 BGP, Border Gateway Protocol.	
14 Q. Do you recall the command syntax of the BY MR. WONG: Q. You mentioned TCP header	
15 command line interface used on the RSX-11M? 09:46:25 15 expression. What does TCP mean? 09:49:	Control of the Contro
16 A. No, I'm sorry. I don't. 16 A. That's Transmission Control Protocol. It's	the ha
17 Q. You mentioned that the LinkedIn profile 17 part of the Internet Protocol suite.	
17 Q. Fou mentioned that the Linkedin profile 17 part of the internet Profocol state. 18 that we marked as Exhibit 136 did not have your full 18 Q. Is TCP an industry standard?	
19 work history? 19 A. It is.	
20 A. Correct. 09:46:46 20 Q. Was it an industry standard at the time you 09:4	0.27
	9.37
23 A. In particular the sys admin positions that 23 Q. What standard-setting body produced the TCP	
24 I mentioned, summer internships predating. There 24 standard? 25 years growth of these. Full time positions that are 20146.50	10
25 were several of those. Full-time positions that are 09:46:59 Page 30 Page 30 Page 30	Page 32
150 Table 200	
1 not relevant to my professional experience, 1 standard was really a product of I guess the	
2 particularly while I was in high school. 2 ARPANET project, but this actually predates IETF	
Q. Sure. After you graduated from USC, what Being accepted as a standards-making body, which is	
4 did you do then? 4 a whole book in itself. Great deal of politics	
5 A. So I next fall I went to Rutgers and 09:47:20 5 behind that. So it was a de facto standard 09:50:1	16
6 spent a year there, hated it and immediately 6 effectively.	
7 transferred to USC. 7 Q. What do you mean by "de facto standard"?	
8 Q. Oh, I'm sorry. My question was after you 8 A. Which meant that the industry used it and	
9 graduated from USC, what did you do after that? 9 it was publicly available, everyone was free to	
10 A. After USC? So I graduated in September 09:47:38 10 adopt it, and yet it did not have the backing of a 09:50	:36
11 of 1990. I worked on a postdoc at USC with 11 formal standards body such as the IEEE.	
12 Deborah Estrin and then took a position at 12 MR. PAK: I'll object to this line of	
13 Cisco Systems. 13 questioning as calling for expert testimony.	
14 Q. Do you know when you started at 14 BY MR. WONG: Q. Now, you said that the	
15 Cisco Systems? 09:47:53 15 TCP standard was really a product of ARPANET;	09:51:10
16 A. January 14th, 1991. 16 correct?	
17 Q. Why did you join Cisco after graduating 17 A. Correct.	
18 from USC? 18 Q. What is ARPANET?	
19 A. Lack of a better job. 19 A. ARPANET was a project from the Defense	
20 Q. Did you apply elsewhere besides Cisco? 09:48:02 20 Department's Advanced Research Projects Agency to	09:51:18
21 A. I did. 21 build a network for computers that was highly robust	
22 Q. And describe for me the projects that you 22 and relayed data between computers efficiently.	
23 worked on while you worked at Cisco starting in 23 Q. How do you know that, Mr. Li?	
24 1991. 24 A. Having worked on it for many, many years	
25 A. I worked on a wide, wide variety of 09:48:22 25 and been involved with it as soon as it became 09:5	1:34
Page 31	Page 33

1 with during this 1001 through 1006 time and 1 at	
1 with during this 1991 through 1996 time period at	1 A. The standard the standard for IS-IS.
2 Cisco?	2 MR. PAK: Ryan, when you get a chance, can
 A. Everything else in the IP protocol suite 	3 we take a break? We've been going for about an
4 within Cisco. This includes RIP, IGRP, EIGRP, EGP,	4 hour.
5 OSPF, IS-IS. I also had my hands in some of the 10:03:14	5 MR. WONG: Sure. We can take a break now. 10:05:45
6 CLNS stack.	6 THE WITNESS: Thank you.
7 Q. What is OSPF?	7 THE VIDEOGRAPHER: Going off the record.
8 A. Open Shortest Path First routing protocol	8 The time is 10:05.
9 from the IETF.	9 (Recess taken from 10:05 a.m. to
10 THE REPORTER: Would you mind repeating 10:03:43	10 10:11 a.m.) 10:11:25
11 that. I'm sorry.	11 THE VIDEOGRAPHER: We're back on the
12 THE WITNESS: Open Shortest Path First	12 record. The time is 10:11.
13 routing protocol from the IETF.	13 BY MR. WONG: Q. Mr. Li, you used the
14 THE REPORTER: Thank you.	14 acronym BGP to refer to the Border Gateway Protocol;
BY MR. WONG: Q. And the RIP and the IGRP 10:03:51	15 correct? 10:11:46
16 you just mentioned, those are the same RIP and IGRP	16 A. Correct.
17 you were discussing earlier today; correct?	17 Q. Is BGP a commonly known acronym for Border
18 A. Yes.	18 Gateway Protocol?
 Q. You mentioned IS-IS. 	19 A. No, not common.
20 What is IS-IS? 10:04:00	20 Q. Okay. Is it a strike that. 10:11:54
A. This is another routing protocol that comes	Why do you use the term "BGP" to refer to
22 from the ISO protocol stack and the OSI standards	22 the Border Gateway Protocol?
23 body. It supports routing for both CLNP and IP.	A. So that's the acronym that is used within
Q. What is CLNP?	24 the industry.
25 A. Connectionless Network Protocol. 10:04:25 Page 42	Q. When you say that's the acronym that's used 10:12:10 Page 44
8 25 W 200 W 2 1 2 1 2 4 4	The second secon
1 Q. And is that protocol also an industry	1 within the industry, you're referring to the BGP
2 standard?	2 acronym; correct?
3 A. Itis.	3 A. Correct.
4 Q. What is the standard-setting body that	4 Q. And when you say "the industry," what do
5 manages CLNP? 10:04:37	5 you mean by "the industry"? 10:12:21
5 manages CLNP? 10:04:37 6 A. ISO.	5 you mean by "the industry"? 10:12:21 6 A. Computer network.
5 manages CLNP? 10:04:37 6 A. ISO. 7 Q. What is ISO?	 5 you mean by "the industry"? 10:12:21 6 A. Computer network. 7 Q. And how long as BGP been used as an acronym
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	A STATE OF THE STA
1 A. Itis.	1 working for Cisco in 1991?
Q. Do you know when you first started using	A. Approximately three.
3 the acronym RIP?	Q. What was your familiarity with the command
A. 1991 when I came to Cisco.	4 line interface on Cisco's routers before you started
5 Q. And did you come up with the acronym RIP? 10:13:48	5 working at Cisco in 1991? 10:16:30
6 A. No, I did not.	6 A. So I used Cisco's CLI for those three years
 Q. Where did you get that acronym from? A. I heard it from coworkers first. 	7 between '87 and 1991.
A. I heard it from coworkers first.Q. And you did not come with the acronym BGP;	Q. What level of familiarity strike that. Was OSPF a well-known acronym in the
10 correct? 10:14:07	
11 A. Correct.	10 networking industry? Actually, strike that. 10:17:02
12 Q. Where did you first hear the acronym BGP?	Is OSPF a well-known acronym in the la networking industry?
13 A. From discussions on a Usenet mailing list.	13 A. Yes, it is very well-known.
14 Q. What is a Usenet mailing list?	
15 A. Usenet was a system for exchanging 10:14:23	14 Q: And when did you first hear of the acronym 15 OSPF, Mr. Li? 10:17:12
16 messaging in a broadcast fashion, and there were	16 A. As part of my employment at Cisco.
17 groups within that where people would circulate	
18 messages. And so there was a discussion of routing	Q. Approximately when did you hear firsthear of OSPF?
19 protocols, and I heard about it first through that.	19 A. About 1992.
20 Q. And what time period are you talking about 10:14:45	20 Q. Approximately how long has "OSPF" been a 10:17:23
21 here when you first heard the acronym BGP?	21 well-known term in the networking industry, to your
22 A. This would be somewhere between about 1985	22 knowledge?
23 to 1990.	23 MR. PAK: Objection. Calls for expert
24 Q. So that was before you started working at	24 testimony.
25 Cisco; correct? 10:15:01	25 THE WITNESS: I suspect at least 1989. 10:17:32
Page 46	Page 48
1 A. Correct.	1 BY MR. WONG: Q. Why do you say that,
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 O. Is "IGRP" also a commonly used term in the 	[1] (A charter -) 사람들은 아니라 보고 아니라 아니라 보고 있다면 아니라 하는 것이 되는 경기를 되는 것이 되었다면 되었다면 되었다면 되었다면 되었다면 되었다면 되었다면 되었다면
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3 networking industry?	2 Mr. Li? 3 A. So there's work started on OSPF early on
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1 discussion of OSPF in 1989?	1 standard?
2 A. I subsequently worked with them as part of	2 A. Not offhand.
3 IETF and learned of their involvement with OSPF.	Q. Is IS-IS a well-known acronym in the
4 Q. You worked strike that.	4 networking industry?
5 When did you work with those individuals as 10:19:31	5 A. Largely, no. 10:22:41
6 part of the IETF?	6 Q. How do you know the IS-IS acronym?
7 A. I started working with them in 1991.	7 A. I'm part of a small group who've made use
8 Q. What companies, if you recall, did those	8 of the protocol.
9 individuals work for?	9 Q. Is IS-IS a well-known acronym amongst those
10 A. John Moy represented Proteon. Milo Medin 10:19:50	10 who make use of the IS-IS protocol? 10:23:01
11 worked for NASA. Cathy Wittbrodt was at	11 A. Yes, it is,
12 Energy Sciences Network at as part of	12 Q. Why is it a smaller group that makes use of
13 Lawrence Livermore Labs.	13 the IS-IS protocol?
14 Q. Did any other vendors strike that.	14 A. So IS-IS is part of the ISO protocol stack
Did any other companies or organizations 10:20:20	15 which ended up not having a significant market 10:23:15
16 besides the ones you just mentioned participate in	16 share, and thus there's a very small user base.
17 OSPF standardization?	17 Only a very small portion of the I net IP
18 MR. PAK: Objection. Calls for	18 networking industry ended up using IS-IS, and so the
19 speculation. Calls for expert testimony.	19 number of people that use IS-IS for IP routing is
THE WITNESS: So I'm certain that several 10:20:32	20 very, very small. 10:23:38
21 others did. The best way to check would be to look	Q. How long has IS-IS been a well-known
22 at the IETF attendance records.	22 acronym amongst those who make use of the IS-IS
BY MR. WONG: Q. When you say you're	23 protocol, to your knowledge?
24 certain that several others did, why are you so	24 A. At least 1991.
25 certain? 10:20:43	Q. And when did when did you first hear of 10:23:50
Page 50	Page 52
1 A. The IETF typically has dozens of people	1 the IS-IS acronym?
2 operating, working together on any given protocol.	2 A. 1991 when I joined Cisco.
 Q. And how do you how do you know that, 	3 Q. Is "IP" a well-known industry term in the
4 Mr. Li?	4 networking industry?
5 A. So that's I started participating in the 10:20:57	5 A. Very well. 10:24:07
6 IETF in 1991, and that's their standard way of	6 Q. In your view, what other acronyms are as
7 working.	7 well-known as IP in the networking industry?
 Q. How many years have you been participating 	8 MR. PAK: Objection. Calls for expert
9 in the IETF since 1991?	9 testimony.
O A. I participated quite consistently up and 10:21:15	THE WITNESS: TCP, TCP/IP, WWW. 10:24:19
1 through about from 1991 to about 1999, and then	11 BY MR. WONG: Q. How long has IP been a
2 it's been sporadic since then.	12 well-known acronym in the networking industry?
 Q. When you say the IETF typically has dozens 	13 A. At least since 1983.
4 of people working together on any given protocol,	Q. And when did you first learn of the acronym
5 are those people from the same company or different 10:21:42	15 IP? 10:24:44
6 companies?	A. Approximately 1984 I took a class in
7 MR. PAK: Objection. Calls for	17 computer networking and read the first read the
8 speculation. Vague.	18 RFCs on IP.
9 THE WITNESS: Typically the group	19 Q. Is BGP a let me start that again.
0 working groups that are working on a protocol draw 10:21:54	20 Is "BGP" a well-known term in the 10:25:25
11 people from all sorts of different companies and	21 networking industry?
2 organizations.	22 A. It is.
BY MR. WONG: Q. Can you think of any	23 Q. How long has "BGP" been a well-known term
4 protocols from the IETF where different	24 in the networking industry?
25 organizations did not participate in creating the 10:22:12	25 MR. PAK: Objection. Calls for expert 10:25:34

1	testimony.	1	What did that entail, maintaining DHCP
2	1	2	relay functionality in Cisco IOS?
3	. 그 그리 집에 2011년 전에 가장하는 이 없었다. 그리지 않는데 내 때에 그 아니는 이 없는데 하지 않는데 없었다	100	A. Means that I had to look at the source
4	"BGP" has been a well-known term in the networking	4	code, read the DHCP RFC, test the behavior of the
5	5 industry since 1993? 10:25:47	5	Cisco DHCP relay and then repair the functionality 10:28:49
6	A. I'm an expert in BGP.	6	in the source code as necessary.
7	Q. Why do you say that you are an expert in	7	Q. At some point, Mr. Li, you left Cisco's
8	BGP?	8	employment; correct?
9	A. I helped deploy BGP throughout the	9	A. Several times.
10	Internet. 10:26:00	10	Q. When you started at Cisco in 1991, when did 10:29:12
11	Q. What did you do to help deploy BGP	11	you leave?
12	throughout the Internet?	12	A. I believe it was 1996.
13	A. So I was responsible for maintaining and	13	Q. What did you do after you left Cisco in
14	enhancing BGP. I was responsible for doing a great	14	1996?
	deal of bug fixing to BGP. And as part of that, I 10:26:17	15	A. After a while I joined Juniper Networks. 10:29:28
	ended up reimplementing much of Cisco's BGP code and	16	Q. And what was Juniper's business at the
	replacing the vast majority of the code that they	17	time?
	had.	18	
19		19	networking space.
	BGP? 10:26:43	20	Q. What was Juniper's main product at the 10:29:41
21	# 1 4 4 5 7 1 5 € 1 5 7	21	time?
	part of the Usenet group.	22	
23	TOTAL TOTAL STREET, MANAGEMENT OF THE STREET, THE STRE	197.79	first product was a router, the M40, and I believe
	networking industry?	24	that came out in 1998.
25	A. It is. 10:27:07 Page 54	25	Q. Did you work on the M40 Juniper router? 10:29:59 Page 56
1	Q. How long has "DNS" been a well-known term	1	A. I did.
2	in the networking industry, Mr. Li?	2	Q. Now, you said Juniper had no product
3	A. At least since late '80s.	3	initially.
4	Q. When did you first learn of the term "DNS"?	4	Did they have no product when you joined
5	A. I was a sys admin at USC at the time. 10:27:19	5	them in 1996? 10:30:16
6	Could have been anywhere from '83 on.	6	
7	Q. How do you know that "DNS" has been a	7	had I was Employee No. 5. We had an office, and
8	well-known term in the networking industry since the	8	that was it.
9	late 1980s?	9	Q. Who were Juniper's competitors?
10	A. So I would helped convert USC from using 10:27:40	10	
11	host text, which was previous system, to using DNS.	11	
12	Q. Is "DHCP" a well-known term in the		exactly when. There was another company called
13	networking industry?		NetStar. Wellfleet. Proteon had not quite gone
14			under.
15		15	That's all I can remember. 10:31:03
	in the networking industry?	16	Q. Now, you said you were Employee No. 5;
17			correct?
18	Q. When did you first hear of the acronym	18	
19	DHCP?	19	Q. Where did the other first employees at
CONTRACT.			Juniper come from? 10:31:15
20		21	A. So the founder Pradeep Sindhu was coming
20 21		-	
20 21 22	1991?		out of Xerox PARC and Sun. Bjorn Liencres I believe
20 21 22 23	1991? A. I helped maintain DHCP relay functionality	23	was Sun. Dennis Ferguson, I knew him through IETF,
20 21 22 23	1991?	23 24	

1			acronym was designated by the IETF.
- 37	that.	2	
3			designated by the IETF"?
4		4	
5			migrate to, decided that we should all refer to 11:49:10
6	Mr. Li?	100	version 6 of the protocol as IPv6.
7	 A. So Yakov and I coauthored or coedited this 	7	
8	document in an attempt to document a routing		that we all should refer to version 6 of the IP
9	protocol architecture a routing architecture for	9	protocol as IPv6?
10	IPv6. 11:46:45	10	
11	Q. What is IPv6?	11	
12	A. That is the next version of the Internet	12	
13	Protocol. What a widely deployed right now today is	13	Q. Were there more than one vendor part of
14	known as IPv4. It has the problem that it does not	14	that discussion?
15	have enough address space and can only support about 11:46:59	15	A. Yes, many. 11:49:40
16	4 billion hosts.	16	Q. Do you recall if Cisco was part of that
17	IPv6 is a the next version that has been	17	discussion?
18	approved by the IETF and we're currently	18	A. I believe so.
19	transitioning to IPv6, slowly.	19	the control of the co
20	Q. We're currently transitioning today, you 11:47:17	20	discussion? 11:49:48
21	mean?	21	A. I believe so.
22	A. Yes. Twenty years and counting.	22	Q. Were there any other acronyms relating to
23	Q. And I'm sorry. What was the date on the	23	routing protocols that the IETF decided should be
24	document marked as Exhibit 138, Mr. Li?	24	used to refer to those protocols?
25	A. That appears to be March 1995. 11:47:33	25	A. Yes, many. 11:50:05
	Page 106		Page 108
1	Q. Was this document strike that.	1	Q. What protocols did the IETF decide that
2	When was the first version of the document	2	everyone in the network industry should use in
3	marked as 138 completed, to your knowledge?	3	addition to IPv6?
4	A. I would have to check my notes to be	4	MR. PAK: Objection. Calls for expert
5	precise but somewhere approximately 1994. 11:48:04	5	testimony. 11:50:18
6	Q. Turning back to Exhibit 139, Mr. Li, what	6	THE WITNESS: So OSPF, BGP, RSVP, LDP,
7	is the date on this document?	7	HTTP.
8	A. December 1995.	8	BY MR. WONG: Q. Was "IS-IS" a a
9	Q. Is that the publication date for this RFC?	9	term strike that.
10	A. Yes, it is. 11:48:19	10	Did the IETF have any role in the decision 11:50:50
11	Q. And was the document that is shown		for IS-IS to be used by the networking industry?
12	Exhibit 139, was that completed before the	12	A. Somewhat. Again, IS-IS was originally
13	publication date shown on Exhibit 139?	13	standardized outside of the IETF. The IETF had the
14	A. Yes, it was.		responsibility of managing the usage of IS-IS for
15	Q. Do you know approximately when? 11:48:34		Internet Protocol routing. 11:51:14
16	A. Somewhere between '93 and '94.	16	Q. And to your knowledge, Mr. Li, based on
17	Q. Did you come up with the term "IPv6,"		your experience working in the industry, did various
18	Mr. Li?		vendors use those acronyms that you just listed out
19	A. No, I did not.		for me?
20	Q. Do you know who? 11:48:42	20	A. Yes, frequently. 11:51:38
21	A. No. Can't be specific.	21	Q. To what extent was there any belief that
22	Q. Is IPv6 a well-known acronym in the	22	these acronyms for routing protocols were
AN AM	networking industry?		proprietary to any single vendor?
	A. Yes, it is. It is a well-known acronym for	24	MR. PAK: Objection. Calls for
23 24			MR. PAK: Objection. Calls for speculation. 11:51:58

AMENONE DIRECTOR CONTROL OF THE FOREIGN ON DECIDE OF CONTROL OF THE CONTROL OF TH	The state of the control of the state of the
1 THE WITNESS: So the acronyms were never	1 by the court reporter and is attached hereto.)
2 proprietary.	2 BY MR. WONG: Q. The court reporter has
3 BY MR. WONG: Q. And on what facts do you	3 marked as Exhibit 140 a document bearing Control
4 base that opinion, Mr. Li?	4 Nos. ARISTANDCA00025927 to -25933.
5 A. So the acronyms were never published with a 11:52:06	5 Mr. Li, have you seen this document before? 11:55:28
6 trademark or copyright notice attached to them.	6 A. I believe so.
7 Q. Did you ever believe personally that the	7 Q. What is the document marked as Exhibit 140?
8 use of OSPF, BGP, IP or any of the other acronyms	8 A. It appears to be a copy of RFC 1966, BGP
9 that we've been discussing today were proprietary to	9 Route Reflection.
10 any vendor? 11:52:32	10 Q. Did you what was your involvement, if 11:55:45
11 A. No.	11 any, in the creation of the document marked as
12 Q. In your experience at multiple companies in	12 Exhibit 140?
13 the networking industry, did anybody else that you	13 A. So I helped discuss many of the concepts in
14 worked with express the belief to you that any of	14 this document. As part of the development and
15 these acronyms were proprietary to any vendor? 11:52:48	15 deployment of BGP, we found that we had numerous 11:56:02
16 A. No.	16 scalability issues that we needed to overcome.
17 Q. So in the 25 years that you have been	17 There were several approaches proposed. I helped
18 working in the networking industry, you have not	18 work on the Route Reflection proposal.
19 heard anybody express the belief that any of these	19 Some of the original work was proposed by
20 acronyms were proprietary to a single vendor? 11:53:08	20 Dimitry Haskin of Bay Networks. And as part of the 11:56:20
21 A. That's correct.	21 IDR working group, we jointly discussed and came up
Q. Turning back to Exhibit 139, Mr. Li, first	22 with this proposal.
23 page further down, second paragraph from the bottom,	23 Mr. Bates and Mr. Chandra eventually wrote
24 the word "domain" is used.	24 up the actual document as you see it here.
25 Do you see that? 11:53:23	25 Q. What is BGP Route Reflection? 11:56:34
Page 110	Page 112
I A. Yes.	A. BGP Route Reflection is a mechanism for
Q. Did you come up with the word "domain"?	2 taking routing information and reflecting it from
3 A. No, I did not.	3 one router to another through a third router. This
4 Q. Do you know who did?	4 allows for better scalability because it fixes the
5 A. I believe that was Dr. Rechter. 11:53:31	5 problem where BGP previously had where all BGP 11:57:03
6 Q. Do you know when Dr. Rechter came up with	6 routers within a particular AS had to be directly
7 the name "domain"?	7 interconnected. That led to some significant
8 A. I believe that he came up with that term	8 computational and configuration management
9 during the work for IDRP, and that flowed and it	9 challenges.
0 is semantically equivalent to Autonomous System, and 11:53:49	10 Q. Who came up with the phrase "Route 11:57:17
1 it flowed from his work in IDRP into both this	11 Reflection"?
2 document and the BGP specification.	12 A. I believe, but I'm not certain, that that
Q. And how do you how do you know that,	13 would be Mr. Haskin.
4 Mr. Li?	14 Q. And Mr. Haskin, to your recollection,
5 A. Direct work with both of those 11:53:58	15 worked for Bay Networks? 11:57:33
6 specifications.	16 A. It may have been Wellfleet at the time.
7 Q. Okay. By the time of this RFC,	17 Q. And just by implication from your answer,
8 December 1995, was "domain" a well-known industry	18 was Wellfleet acquired by Bay Networks?
THE STATE OF THE S	and the second control to the second second second to the second
9 term?	19 A. Bay and I'm sorry.
	19 A. Bay and I'm sorry. 20 Yes, Bay Bay was the merger of Synoptix 11:57:52
MR. PAK: Objection. Vague. 11:54:10	20 Yes. Bay Bay was the merger of Synoptix 11:57:52
MR. PAK: Objection. Vague. 11:54:10 THE WITNESS: No, it was not well-known and	20 Yes. Bay Bay was the merger of Synoptix 11:57:52 21 and Wellfleet, and I believe he was on the Wellfleet
MR. PAK: Objection. Vague. 11:54:10 THE WITNESS: No, it was not well-known and still is not very well-known.	20 Yes. Bay Bay was the merger of Synoptix 11:57:52 21 and Wellfleet, and I believe he was on the Wellfleet 22 side.
MR. PAK: Objection. Vague. 11:54:10 THE WITNESS: No, it was not well-known and still is not very well-known. MR. WONG: Let's mark this one as 140,	20 Yes. Bay Bay was the merger of Synoptix 11:57:52 21 and Wellfleet, and I believe he was on the Wellfleet 22 side. 23 Q. And why do you think that Mr. Haskin came
MR. PAK: Objection. Vague. 11:54:10 THE WITNESS: No, it was not well-known and still is not very well-known.	20 Yes. Bay Bay was the merger of Synoptix 11:57:52 21 and Wellfleet, and I believe he was on the Wellfleet 22 side.

_		
1	I, the undersigned, a Certified Shorthand	
2	Reporter of the State of California, do hereby	
3	certify:	
5	That the foregoing proceedings were taken before me at the time and place herein set forth;	
6	that any witnesses in the foregoing proceedings,	
7	prior to testifying, were administered an oath; that	
8	a record of the proceedings was made by me using	
	machine shorthand which was thereafter transcribed	
	under my direction; that the foregoing transcript is	
11	a true record of the testimony given.	
12	Further, that if the foregoing pertains to	
13	그렇게 그렇게 되었는데 이 그는 그렇게 다양하게 되는 데를 다시 그렇지 않는데 그렇게 되었다.	
14	Case, before completion of the proceedings, review	
15	of the transcript [X] was [] was not requested.	
16	I further certify I am neither financially	
17	interested in the action nor a relative or employee	
18	이외에서 그런 하면 가게 되었다면서 되었다는 그리면 얼굴이 있는데, 나무에 들어 보고 있는데 그런데 하게 되었다면 하게 된다. 그리는 그런데 하는데 모든데.	
19	IN WITNESS WHEREOF, I have this date	*
20	subscribed my name.	
21	Dated: February 3, 2016	
22 23		
23		
24	Susan r. Magee	
25	CSR No. 11661, RPR, CCRR, CLR	
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1
                  UNITED STATES DISTRICT COURT
 2
                 NORTHERN DISTRICT OF CALIFORNIA
 3
                       SAN JOSE DIVISION
 4
 5
     CISCO SYSTEMS, INC.,
 6
                   Plaintiff,
 7
                                  No. 5:14-cv-05344-BLF(PSG)
     vs.
 8
     ARISTA NETWORKS, INC.,
 9
                   Defendant.
10
11
        CONFIDENTIAL PURSUANT TO THE PROTECTIVE ORDER
12
13
                 VIDEOTAPED DEPOSITION OF TONG LIU
14
                      FRIDAY, JANUARY 15, 2016
15
16
                       PALO ALTO, CALIFORNIA
17
18
19
20
21
     Reported by:
     ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR
22
23
     CSR LICENSE NO. 9830
24
     JOB NO. 2211574
25
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UNITED STATES DISTRICT COURT 2	,	CONFIDENTIAL PURSUANT	10	THE TROTECTIVE ORDER
3 SAN JOSE DIVISION 4 4 4 4 4 6 6 6 6 6	1	UNITED STATES DISTRICT COURT	1	INDEX
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S CISCO SYSTEMS, INC., 6 Plaintiff, 7 ss. No. 5:14-ev-05344-BLF(PSG) 7 ss. N	3	SAN JOSE DIVISION	3	WITNESS: Tong Liu
Plaintiff, 7 vs. No. 5:14-cv-05344-BLF(PSG)	4		4	
7 No. 5:14-ev-05344-BLF(PSG) 7 By Mr. Pak 185	5	CISCO SYSTEMS, INC.,	5	EXAMINATION PAGE
8 ARISTA NETWORKS, INC., 9 Defendant. 10 10 11 11 11 11 11 11 12 13 14 Videotaped Deposition of Tong Liu, taken on 15 Friday, January 15, 2016, pursuant to notice, on 16 behalf of the Defendants, at 610 Page Mili Road, 17 Palo Alto, California befrene, ANDREA M. IGNACIO, 18 CSR, RPR, CRR, CCRR, CLR - CSR License No. 9830 19 Pal ALTO, California befrene, ANDREA M. IGNACIO, 18 CSR, RPR, CRR, CCRR, CLR - CSR License No. 9830 19 Pal California befrene, ANDREA M. IGNACIO, 19 CSR, RPR, CRR, CCRR, CLR - CSR License No. 9830 10 Pal Alto, California befrene, ANDREA M. IGNACIO, 10 Pal ALTO, California befrene, ANDREA M. IGNACIO, 11 CSR, RPR, CRR, CCRR, CLR - CSR License No. 9830 11 APPEARANCES: 12 Exhibit 93 6-25-08 E-mail, Subject Seeking 122 12 CSI-CLL-00610555 - '81; 27 pgs. 12 Exhibit 95 6-25-08 E-mail, Subject Seeking 122 13 permission for adding PTP CLI 14 Comments; Bates CSI-CLI-00846643; 15 pg. 16 Palos Alto, San Francisco, California 49111 16 Phone: 415-875-6600 17 Gaidmin Street, 22nd Floor 18 San Francisco, California 49111 19 Phone: 415-873-6682 19 Phone: 415-873-6682 10 CSI-CALI-00073381 - '.000014; 15 pgs. 23 Annote San Francisco, California 49111-1809 24 CSI-CALI-00073381 - '.000014; 15 pgs. 25 ALSO PRESENT: Kevin Foor, Videographer 26 CSI-CANI-00073381 - '.000014; 15 pgs. 27 CSI-CANI-00073381 - '.000014; 15 pgs. 28 CSI-CANI-00073381 - '.000014; 15 pgs. 29 CSI-ANI-00073381 - '.000014; 15 pgs.	6	Plaintiff,	6	By Mr. Wong 7, 207
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10 EXHIBIT PAGE 11 EXHIBIT PAGE 12 Exhibit 92 Amended Exhibit 7; 45 pgs. 67 12 Exhibit 92 Amended Exhibit 7; 45 pgs. 67 12 Exhibit 93 IEEE Standard for a Precision 84 13 Clock Synchronization Protocol 14 for Networked Measurement and 15 Friday, January 15, 2016, pursuant to notice, on 15 Control Systems, Bates 16 ARISTANDCA0031733 - 32021; 289 pgs. 18 Exhibit 94 IEEE1588 Precision Tine Protocol 100 Pale ARISTANDCA0031733 - 32021; 289 pgs. 18 Exhibit 94 IEEE1588 Precision Tine Protocol 100 Paleform-Independent Software 20 Functional Specification, Bates 21 CSI-CLI-00610555 - 81; 27 pgs. 22 Exhibit 95 6-25-08 E-mail, Subject Seeking 122 23 permission for adding PTP CLI 24 comments; Bates CSI-CLI-00846643; 25 1 pg. Page 4 25 Page 5 Page 7 Page 8 Page 9 Page 9	8	ARISTA NETWORKS, INC.,	8	
10	9	Defendant.	9	EXHIBITS
11			10	EXHIBIT PAGE
12 13 14 15 15 15 15 15 15 15			11	Exhibit 92 Amended Exhibit F; 45 pgs. 67
13			12	Exhibit 93 IEEE Standard for a Precision 84
14			13	Clock Synchronization Protocol
15		Videotoned Denosition of Tong Live token on	14	for Networked Measurement and
16			15	Control Systems, Bates
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18 CSR, RPR, CRR, CCRR, CLR ~ CSR License No. 9830 19 Platform-Independent Software 20 Platform-Independent Software 20 Functional Specification, Bates 21 CSI-CLI-00610555 - '81; 27 pgs. 22 Exhibit 95 6-25-08 E-mail, Subject: Seeking 122 23 permission for adding PTP CLI 24 comments; Bates CSI-CLI-00846643; 25 I pg. Page 2 25 Page 2 26 Page 2 Page 4 Page 4 Page 5 Page 6 Page 6 Page 7 Page 6 Page 7 Page 8 Page 7 Page 8 Page 8 Page 9 Pag	Ì		17	289 pgs.
19			18	Exhibit 94 IEEE1588 Precision Tine Protocol 100
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21 CSI-CLI-00610555 - '81; 27 pgs.			20	Functional Specification, Bates
23			21	CSI-CLI-00610555 - '81; 27 pgs.
24 comments; Bates CSI-CLI-00846643; 25 1 pg. Page 4 1 APPEARANCES: 2 3 EXHIBIT PAGE 4 ON BEHALF OF THE PLAINTIFF CISCO SYSTEMS, INC., and 5 the WITNESS: 6 QUINN EMANUEL URQUHART & SULLIVAN, LLP 6 commands, Bates CSI-CLI-00608739 7 By: SEAN S. PAK, Esq. 7 - '40; 2 pgs. 8 Exhibit 97 6-26-08 E-mail, Subject: Seeking 128 Exhibit 97 6-26-08 E-mail, Subject: Seeking 128 Permission for adding PTP CLI commands, Bates CSI-CLI-00608739 10 commands, Bates CSI-CLI-00608739 11 commands, Bates CSI-CLI-00608739 128 Exhibit 97 6-26-08 E-mail, Subject: Seeking 128 Exhibit 97 6-26-08 E-mail, Subject: Seeking 128 Exhibit 98 Cisco Nexus 7000 Series NX-OS 157 13 System Management Command 14 Command 14 ON BEHALF OF THE DEFENDANT ARISTA NETWORKS, INC.: 15 Lexhibit 98 Cisco Nexus 7000 Series NX-OS 157 13 System Management Command 14 Reference, Bates CSI-CLI-00194055 15 KEKER & VAN NEST LLP 15 - '9480; 626 pgs. 16 By: RYAN WONG, Esq. 16OO 18 San Francisco, California 94111-1809 18 San Francisco, California 94111-1809 18 Phone: 415.773.6682 19 PREVIOUSLY MARKED EXHIBITS 20 rwong@kvn.com 20 21 Exhibit 53 CLI Design and Review Guide, Bates 22 CSI-ANI-00073381 - '.000014; 15 pgs. 23 24OO 24 25	22		22	Exhibit 95 6-25-08 E-mail, Subject: Seeking 122
25	23		23	permission for adding PTP CLI
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3 EXHIBIT PAGE 4 ON BEHALF OF THE PLAINTIFF CISCO SYSTEMS, INC., and 5 the WITNESS: 6 QUINN EMANUEL URQUHART & SULLIVAN, LLP 7 By: SEAN S. PAK, Esq. 8 50 California Street, 22nd Floor 9 San Francisco, California 94111 10 Phone: 415.875.6600 11 seanpak@quinnemanuel.com: 11 - '57; 2 pgs. 12 Exhibit 98 Cisco Nexus 7000 Series NX-OS 157 13 System Management Command 14 ON BEHALF OF THE DEFENDANT ARISTA NETWORKS, INC.: 15 KEKER & VAN NEST LLP 16 By: RYAN WONG, Esq. 17 633 Battery Street 18 San Francisco, California 94111-1809 19 Phone: 415.773.6682 10 PREVIOUSLY MARKED EXHIBITS 20 rwong@kvn.com 21 Exhibit 53 CLI Design and Review Guide, Bates 22 CSI-ANI-00073381 - '.000014; 15 pgs. 23 240O 24 25	1.	APPEARANCES:	1	EXHIBITS (Continued.)
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5 the WITNESS: 5 permission for adding PTP CLI 6 QUINN EMANUEL URQUHART & SULLIVAN, LLP 6 commands, Bates CSI-CLI-00608739 7 By: SEAN S. PAK, Esq. 7 - '40; 2 pgs. 8 50 California Street, 22nd Floor 8 Exhibit 97 6-26-08 E-mail, Subject: Seeking 128 9 San Francisco, California 94111 9 permission for adding PTP CLI 10 commands, Bates CSI-CLI-00846656 11 - '57; 2 pgs. 12 Exhibit 98 Cisco Nexus 7000 Series NX-OS 157 13 System Management Command 14 ON BEHALF OF THE DEFENDANT ARISTA NETWORKS, INC.: 14 Reference, Bates CSI-CLI-00194055 15 KEKER & VAN NEST LLP 15 - '9480; 626 pgs. 16 By: RYAN WONG, Esq. 16 17 OO 18 18 PREVIOUSLY MARKED EXHIBITS 20 rwong@kvn.com 20 21 Exhibit 53 CLI Design and Review Guide, Bates 22 CSI-ANI-00073381 - '.000014; 15 pgs. 23	3		3	EXHIBIT PAGE
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7 - '40; 2 pgs. 8 50 California Street, 22nd Floor 8 Exhibit 97 6-26-08 E-mail, Subject: Seeking 128 9 San Francisco, California 94111 9 permission for adding PTP CLI 10 Phone: 415.875.6600 10 commands, Bates CSI-CLI-00846656 11 - '57; 2 pgs. 12 12 Exhibit 98 Cisco Nexus 7000 Series NX-OS 157 13 System Management Command 14 ON BEHALF OF THE DEFENDANT ARISTA NETWORKS, INC.: 14 Reference, Bates CSI-CLI-00194055 15 KEKER & VAN NEST LLP 15 - '9480; 626 pgs. 16 By: RYAN WONG, Esq. 16 17 oOo 18 San Francisco, California 94111-1809 18 19 PREVIOUSLY MARKED EXHIBITS 20 21 21 Exhibit 53 CLI Design and Review Guide, Bates 22 CSI-ANI-00073381 - '.000014; 15 pgs. 23 oOo 24 oOo 25	5	the WITNESS:	5	permission for adding PTP CLI
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10	8	50 California Street, 22nd Floor	8	Exhibit 97 6-26-08 E-mail, Subject: Seeking 128
11 seanpak@quinnemanuel.com: 11 -'57; 2 pgs. 12 Exhibit 98 Cisco Nexus 7000 Series NX-OS 157 13 System Management Command 14 ON BEHALF OF THE DEFENDANT ARISTA NETWORKS, INC.: 14 Reference, Bates CSI-CLI-00194055 15 KEKER & VAN NEST LLP 15 -'9480; 626 pgs. 16 By: RYAN WONG, Esq. 16 17 00 18 San Francisco, California 94111-1809 18 19 PREVIOUSLY MARKED EXHIBITS 20 21 21 Exhibit 53 CLI Design and Review Guide, Bates 22 CSI-ANI-00073381 - '.000014; 15 pgs. 23 23 24 24 25 25	9	San Francisco, California 94111	9	permission for adding PTP CLI
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		Page 3		Page 5

	CONTIDENTIAL LONGOMINI		1111	TROTECTIVE ORDER
1	PALO ALTO, CALIFORNIA	1	Α	At work, I go with Toni.
2		2		Could you spell Toni for me, please.
3	9:32 A.M.	3		
4		4	Q	Okay. Have you gone by Toni Liu for for
5		5	what 1	period of time have you gone by Toni Liu?
6		6	Α	That name is only used at work. It's not an
7	THE VIDEOGRAPHER: Good morning. We are on	7	officia	ally alternative name.
8	the record at 9:32 on January 15th of the year 2016.	8	Q	And besides Toni Liu, have you gone by any
9	This is the video deposition of Tong Liu.	9	other	names, Ms. Liu?
10	My name is Kevin Foor. I'm here with court	10		No.
11	reporter Andrea Ignacio. And we are here from	11		Could you please state your home address.
12	Veritext Legal Solutions at the request of Keker &	12		1741 Pear Tree Lane, Mountain View.
	Van Nest.	13		And do you have any personal e-mail addresses
14	3		-	ou use?
	Sonsini Goodrich & Rosati in Palo Alto.	15		Yes.
16	The caption of the case is Cisco Systems,	16		Could you please tell me what those are.
1	Inc., v. Arista Networks. That is case 514-CV-05344	17		tonieliu@yahoo.com.
	ELF BSG.	18		Okay. Any other e-mail addresses?
19	Please note that audio and video recording	19		liu.toni@gmail.com.
1	will take place unless all parties agree to go off the	20	-	Thank you.
1	record. Microphones are sensitive and may pick up	21 22		Who is your current employer, Ms. Liu? Aruba Networks.
	whispers, private conversations, and cell interference.	23		Do you have a work address for Aruba
24	I'm not related to any party in this action,	1	Netwo	
	nor am I interested financially in the outcome in any	25		1322 Crossman Avenue, Sunnyvale.
23	Page 6	2.5	71	Page 8
		1		D 1
1	way.	1		Do you have a work e-mail address for your
2			-	Aruba?
4	please state them at the time of your appearance. And if you would please state your	3		toniliu@arubanetworks.com.
	appearances.	5		Now, Ms. Liu, are you represented by counsel deposition?
6	MR. WONG: Ryan Wong from Keker & Van Nest	6		I'm represented by attorney Mr. Sean Pak.
1	for defendant Arista Networks.	7		Okay. And do you understand that you are
8	MR. PAK: Sean Pak of Quinn Emanuel,			ring here today in response to a subpoena issued
i	representing Cisco and the witness.	1		lawsuit?
10	THE VIDEOGRAPHER: Thank you.	10		Yes.
11	If the court reporter would please swear the	11		Okay. Have you seen the subpoena issued in
12	·	12	this la	
13		13		Yes.
14	TONG LIU,	14		Did you see the document requests that
15	having been sworn as a witness	15		panied the subpoena in this lawsuit?
16	by the Certified Shorthand Reporter,	16		The document?
17	testified as follows:	17	Q :	Requests for documents.
18		18		Requests for documents?
19	EXAMINATION	19	Y	es, I have seen that part.
20	BY MR. WONG:	20		And did you search for documents that fell
21		21	within	the categories within the subpoena?
2.1	Q Good morning, Ms. Liu.	21		
22	A Good morning.	22		I looked around. I don't have any of those
ł	A Good morning. Q Please state your full name for the record.	22 23	A docum	nents.
22	A Good morning. Q Please state your full name for the record. A Tong Liu.	22 23 24	A docum	nents. Ms. Liu, have you ever been deposed before?
22 23	A Good morning.Q Please state your full name for the record.A Tong Liu.Q Do you go by any other names, Ms. Liu?	22 23	A docum	Ms. Liu, have you ever been deposed before? No. This is the first time.
22 23 24	A Good morning. Q Please state your full name for the record. A Tong Liu.	22 23 24	A docum	nents. Ms. Liu, have you ever been deposed before?

1 document in front of you. 2 A (Witness complies.) 3 Q You did not come up with the term PTP; 4 correct? 5 A No. 6 Q The the acronym PTP was in use before you 7 began implementing PTP functionality into Cisco's 8 industrial Ethernet device; correct? 9 A You mean before we implement the protocol, no 10 one was using PTP term in Cisco? 11 Q No. 12 I'm I'm just saying, the acronym PTP 13 A Right. 14 Q was in use before you began implementing 15 PTP functionality into Cisco's industrial Ethernet 16 devices; correct? 17 A Yes, I yeah, the term exist 18 Q Right. 19 A about the 20 Q It it it was in the the document 21 here marked as Exhibit 22 A Yes. 23 Q 93; correct? 24 A Yes. 25 Q And, in fact, on page 7 of Exhibit 93	_		,	
3 A Yes. 4 Q Did I read that correctly? 5 A Yes. 6 Q Is that referring to the implementation that 7 your did, Ms. Liu? 8 A Yes. We were DSBU, and X-Men 2 was the 9 intermal release number we were using for 10 Q Did you come up with X-Men 2 and the year of the protection of the year of the y	1	starting in 2008."	1	actually, are you on page 7?
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		-	
1	industrial Ethernet devices; right?	1	
2	MR. PAK: Objection; assumes facts not in	2	Do you see that?
3	evidence; mischaracterizes the witness' prior	3	A Yes.
4	testimony,	4	Q Definition 3.1.4 in the IEEE PTP
5	THE WITNESS: In this spec, yes.	5	specification defines the term "clock."
6	MR. WONG: Q. Well, is PTP used in Cisco's	6	Do you see that?
7	industrial Ethernet device in a different way than	7	A Yes, uh-huh.
8	what PTP means in Exhibit 93?	8	Q What is the definition of clock in the IEEE
9	MR. PAK: Objection; vague.	9	standard?
10	MR. WONG: Let me rephrase the question.	10	A It's no participating in the precision time
11	Q In the five commands that you're associated	11	
12	with in Exhibit 92	12	measurement of the passage of time since a defined
13	A Right.	25,000	epoch.
14	Q all of them use the acronym PTP; correct?	14	
15	A Yes.	15	you began developing the PTP functionality in Cisco's
16	Q That PTP refers to the same PTP that is shown		industrial Ethernet devices; right?
17	on page 8 of Exhibit 93; right?	17	
18	MR. PAK: Objection; vague.	18	
19	THE WITNESS: I think when I chose the	100	terms before you began working on the PTP
	command, yes, I used PTP to mean the same as precision	7.1-7	functionality; correct?
	time protocol	21	
22	MR. WONG: Right.	22	
23	THE WITNESS: as in the spec.	-	correct?
24	MR. WONG: Q. As in the spec and, in fact,	24	
	as in as on page 8 of Exhibit 93, correct, which	25	
45	Page 106	42	Page 108
-		100	
	lists the PTP which lists PTP as an acronym;	1000	read, is that your understanding of what a clock is in
	correct?	100	the context of PTP?
3		3	
4	THE WITNESS: I would say the meanings are	4	AND A THE PARTY OF
	the same, that they mean precision time protocol.		standard or spec, yes, a clock means this.
6	MR. WONG: Q. Well, the the words are the	6	The state of the s
	same, too; correct?	620	page 4 of
8	PTP in the command is the same three letters	8	
	that appear on page 8 of Exhibit 93; correct?	9	
10	A It's the same acronym.	10	
11	Q And they're referring to the same protocol;	11	
	correct?	SERVICE SERVIC	the term clock in the context of PTP; correct?
13	A Yes.	13	
14	Q Now, if you'll turn to page 4 of Exhibit 93.	14	
15	A (Witness complies.) Okay.	15	The state of the s
16	Q You can take off the well		standard marked as Exhibit 93; correct?
17	A This is	17	
18	Q maybe you want to keep that together,	18	the contract of the contract o
19	actually.	19	
20	A Right.	20	A (Witness complies.) Right.
21	Q On page 4 of Exhibit 93, there is a large	21	Q Term 3.1.23; do you see that?
22	heading No. 3 entitled:	22	It defines the term "parent clock" correct?
23	"Definitions, acronyms, and abbreviations."	23	
	Do you see that?	24	
24	Do you see that.		
25	A Yes.	25	A The master clock to which a clock is
	The state of the s	25	A The master clock to which a clock is Page 109

1 synchronized.	1 Do you see that?
2 Q And is that your understanding of what a	2 A I haven't found that sentence.
3 parent clock is in the context of PTP?	Oh, yeah, found it.
4 A It is.	4 Q Okay. That sentence in the IEEE standard
5 Q And you get that understanding from the IEEE	5 uses the term parents; do you see that?
6 standard marked as Exhibit 93; correct?	6 A Yes.
7 A Yes.	7 Q Is it your understanding that that that
8 Q All right.	8 parents term refers to a parent clock?
9 You don't disagree with that definition;	9 MR. PAK: If you need to take some time to
10 correct?	10 look at the document more closely, you can do that.
11 A No.	11 THE WITNESS: Yes.
12 Q And you don't disagree with the definition of	MR. PAK: Okay.
13 clock in the IEEE PTP standard; right?	13 THE WITNESS: I think it it's referring to
14 A No, I don't.	14 the parent clock.
15 Q Okay. Now, the term parent also refers to	MR. WONG: Right.
16 the parent clock in a PTP context; correct?	16 Q There's no ambiguity in the context of the
17 A The term parent	17 IEEE standard that parent refers to parent clock;
18 MR. PAK: Objection; vague.	18 right?
19 THE WITNESS: in this document	19 A Yes. Here, it means yeah, it does mean
20 MR. WONG: Yes.	20 parent clock.
21 THE WITNESS: whenever yeah, a parent	21 Q Okay. So, in the context of the PTP
22 clock is used, it means the definition here.	22 standard, referring to the parent of a clock is
23 MR. WONG: Sure.	23 referring to the defined term parent clock that we
24 THE WITNESS: Is that the question?	24 discussed a few minutes ago; correct?
25 MR. WONG: Sure.	25 A Yes.
Page 110	Page 112
T 0 TC 114	
1 Q If you'd turn to page 53 of Exhibit 93. Let	1 Q Okay. Now, if you look on that same page,
2 me know when you're there.	2 underneath the heading "PTP Device Attributes," you
2 me know when you're there.3 A 53?	2 underneath the heading "PTP Device Attributes," you 3 see the term "Priority 1"?
 2 me know when you're there. 3 A 53? 4 Q The ending control number for that is '31805, 	 2 underneath the heading "PTP Device Attributes," you 3 see the term "Priority 1"? 4 A Yes.
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jet.e		
	applicable PTP protocol" I'm sorry "PTP	1 Q So, it is a it is a requirement to comply
	profile."	2 with the standard for there to be a value of
3	and the state of t	3 priority 1 that is configurable as described here on
4		4 page 53; correct?
5		5 A Yes.
6	• •	6 MR. PAK: Same and again same objection:
7	[7 calls for expert testimony.
8		8 MR. WONG: Q. If you'd turn I'm sorry. 9 And and do you have any disagreements with
9		
11	standard; correct? MR. PAK: Same objection; calls for expert	10 the description of priority 1 here on page 53? 11 A No.
	testimony.	12 Q Okay. If you'd turn to the next page in
13		13 Exhibit 93.
	question.	14 A (Witness complies.)
15		15 Q At the top, it has another attribute,
16		16 "priority 2."
17	0.7	Do you see that?
	the IEEE standard; correct?	18 A Yes.
19		19 Q And the definition of priority 2 also has a
	testimony.	20 sentence that says:
21	MR. WONG: Q. And it may help	21 "The value of priority 2 shall be
22	The standing of the second control of the se	22 configurable to any value in the range 0 to 255,
	recommending that priority 1 is an attribute, that	23 unless restricted by limits established by an
	this is a configurable value.	24 applicable PTP profile."
25	Q If you'd turn to page 9 of the same document,	25 Do you see that?
	Page 114	
1	Exhibit 93.	1 A Uh-huh, yes.
2	A (Witness complies.) Okay.	2 Q So the value of priority 2 strike that.
3	Q And you see right in the middle of the page,	3 So it's a requirement to comply with the PTP
4	it says "word usage"; correct?	4 standard for the value of priority 2 to be
5	A Uh-huh, I see.	5 configurable as described here on page 54; correct?
6	Q And it defines "shall" in 4.2.1.	6 MR. PAK: Same objection; calls for expert
7	Do you see that?	7 testimony.
8	A Yes.	8 THE WITNESS: Yes, it's a parameter.
9	Q And this is and you you read the entire	9 MR. WONG: Right.
10		
	standard before you implemented any of the	10 THE WITNESS: Right.
11	functionality with Cisco's products; right?	THE WITNESS: Right.Q And that's your understanding, based upon the
11 12	functionality with Cisco's products; right? A Yes.	 THE WITNESS: Right. Q And that's your understanding, based upon the standard's own definition of what "shall" means within
11 12 13	functionality with Cisco's products; right? A Yes. Q The definition of "shall" well, why don't	THE WITNESS: Right. Q And that's your understanding, based upon the standard's own definition of what "shall" means within the document; correct?
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2	these two parameters as configurable for PTP clock.	2	interval."
3	The state of the s	3	Carried State Control of the Carried State Co
4		4	5.7 (7.77)
5	CONTRACTOR OF CONTRACTOR OF CONTRACTOR CONTR	5	· · · · · · · · · · · · · · · · · · ·
6		6	7
7		7	the mean time interval between successive sync
8	Q Exhibit 93; correct?	8	messages, i.e., the sync interval, when transmitted as
9	A Yes.	9	multicast messages."
10	Q Is it possible to have vendor	10	Do you see that?
11	interoperability for PTP if you don't comply with the	11	A Yes.
12	PTP standard?	12	Q Did I read that correctly?
13	MR. PAK: Objection; calls for expert	13	A Yes.
14		14	Q So the and that sentence, by the way, uses
15	MR. WONG: Q. In your view?	15	
16	MR. PAK: Same objections.	16	The season of the contract of
17	THE WITNESS: In my view, the basic external	17	
18	그는 그 그는 그 그 그리고 얼마나 보고 있는데 하면 하면 하면 하는데 가입니다. 그렇게 그 그 그 그리고 있는데 그리고 있는데 그리고 있는데 그리고 있는데 그리고 있다면 없다고 있다.	A1322	requirement of the PTP standard; correct?
19	MR. WONG: Q. And are the device attributes	19	7
20	HERE - HERE IN THE SELECTION OF	215000	testimony.
21		21	THE WITNESS: I my understanding is this
22	스팅하는 유지에 살을 맞는 사람들은 기계를 가지 않는데 살을 보면 하면 하는데 살을 하는데 하는데 하는데 하는데 되었다. 그는데 하는데 살을 가게 살아가 살아 하는데 먹었다.	253,000	is to be supported to implement a PTP protocol.
23	MR. PAK: Same objection; vague.	23	MR. WONG: Q. And that understanding is
24	THE WITNESS: I think the priority value	10114757	based upon the definition of "shall" provided on
	being configurable, changeable by users is as you	100	page 9 of the standard; correct?
23	Page 118	23	Page 120
	1480110		1160120
		786	William Control of the Control of th
	said, as required it's required to be	1	A Yes, uh-huh.
		2	Q That definition of "shall" says that no
	interoperable MR. WONG: Okay.	2	Q That definition of "shall" says that no deviation is permitted; correct?
2	interoperable	2	Q That definition of "shall" says that no
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	CONTIDENTIAL FORSCANT	10	THE TROTECTIVE CREEK
1	correct?	1	hierarchy existed before you started adding PTP
2	A Yes.	2	commands to the software?
3	Q And if you'll look briefly at Exhibit 96.	3	A Yes.
4	Let me know when you're there.	4	Q And you were aware of that?
5	A Yes.	5	A I'm yeah, I was aware of that.
6	Q Under "interface level config commands,"	6	Q Right.
7	그 그 그 사람들은 그 집에 가는 것이다. 그렇게 되었다면 가장 모든 사람들이 가장 하면 하다면 하는 것이 없는 것이 없어 가지를 하는데 하다.	7	And so you modeled you modeled your
8	Do you see that?	8	
9	A PTP sync-interval, yes.	9	existed in Cisco software?
10	Q With a hyphen	10	MR. PAK: Objection; vague.
11	A With a hyphen.	11	THE WITNESS: I think I was thinking it would
12	Q between sync and interval?	12	be good to have that part for these CLI commands.
13	A Right.	13	MR. WONG: Okay. Okay.
14	Q Did you remove the hyphen based upon	14	I think it's a good time to take a break.
15	Mr. Woodman's directive?	15	THE VIDEOGRAPHER: It is 1:01.
16	A Yes, I believe that should be true.	16	We are going off the record.
17	Q And the purpose of removing the hyphen, as	17	Please don't forget your mics.
13.338	described in Mr. Woodman's e-mail marked as	18	(Lunch break taken at 1:01 p.m.)
	Exhibit 97, was to take advantage of the auto complete	19	oOo
F 165,500,544	functionality; correct?	20	
21	MR. PAK: Objection; mischaracterizes the	21	
	witness' testimony; incomplete.	22	
23	THE WITNESS: I would say both auto	23	
1880	completion and hierarchy as	24	
25	MR. WONG: Q. What go ahead.	25	
0.00	Page 134	77.5	Page 136
1	A You go ahead first.	1	AFTERNOON SESSION
2	Q What in your mind, what is the difference	2	1:41 P.M.
3	between auto completion functionality and hierarchy?	1500	
4	A Hierarchy let's say there is PTP sync	4	
5	interval, PTP sync limit. So, when we type PTP,	5	
	space, sync, and then question mark, that gives you	6	THE VIDEOGRAPHER: We are back on the record.
55018	the next level of that command, which is interval. So	7	It is 1:41.
8	this is the hierarchy part, which won't be there if	8	MR. WONG: Q. So, Ms. Liu, before the lunch
	there is a hyphen. So, all of them would be under	9	break, we talked about the five commands that are
	PTP, and you have all of the options.		associated with you in Exhibit 92.
11	Q Did you come up with the idea to have a	11	A Yes.
12	hierarchy for these PTP commands?	12	Q One of the commands is "PTP priority 1."
13	MR. PAK: Objection; vague.	13	A Yes.
14	THE WITNESS: Meaning can you rephrase	14	Q Do you see that?
15	that. Did I come up with the concept?	15	A Uh-huh.
16	MR. WONG: You just described the concept of		Q What is the function that the "PTP
	a hierarchy.		priority 1" command performs?
18	Q Was that concept did that concept	18	A It configures the priority 1 parameter for
	originate from you?	110000	the PTP clock.
20	MR. PAK: Objection; vague.	20	Q Okay. And when you say "for the PTP clock,"
21	THE WITNESS: A lot of Cisco CLI commands	ACCOUNT.	you mean PTP as defined by the IEEE standard; right?
22	has have hierarchies. That part I knew even before	22	A Yes.
	I developed these commands.	23	Q You're not talking about a different PTP
24	MR. WONG: Okay.		that's separate from the IEEE standard; right?
25	Q So the organization of Cisco commands in a	25	A No.
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